

## REMARKS

Headings have been added to the specification, as required.

Main claim 9 has been amended by adding a limitation found in now-canceled claim 17, namely, that the wall portion has a length of more than  $\lambda_g/4$ .

The applicants respectfully request reconsideration of the Examiner's opinion that this feature of claim 17 is disclosed by Pierce in Figures 20-25.

Of the six drawings referred to by the Examiner, only Figure 24 shows any openings (i.e., elements 235 and 236). All the remaining figures show the waveguides' external views, which do not disclose anything about the location, size or shape of any openings that may be inside the waveguides.

Also worth noting from the Examiner's analysis of Figures 20 - 25 is that the element 249 is a tuning screw (see col. 22, line 49) and *not an aperture* (opening), as suggested by the Examiner, and Figure 24 shows that the tuning screws and the openings 235, 236 are in different planes.

In addition, the dimension  $\lambda_g/4$  used in Figure 25 refers to a distance between centers of the tuning screws 249, and *not a dimension between openings*.

Turning to Figure 24, the openings 235 and 236 are shown in cross-section, and this does *not* provide any indication about the size of the section of the wall between two adjacent openings.

The Examiner also rejected claim 9 based on Barnett. The Examiner determined that Barnett disclosed "two adjacent coupling openings of said plurality having a distance of  $(2n+1) * \lambda_g/4$  from each other" in col. 5, lines 13 - 17. However, this feature of claim 9 clearly refers to a distance

*between openings*, whereas the passage relied upon by the Examiner discloses a distance measured from the short 38 (i.e., the closed end of a waveguide).

Although Barnett also discloses an "odd number of quarter wavelengths" in this passage, it is important to note that the wavelengths refer to wavelengths of cavities formed between the waveguides 10 and 16, as explained in the remaining part of the paragraph starting in line 9 of col. 5. The channel filters referred to in this paragraph are discussed in col. 4, lines 31 - 35 and are illustrated in Figure 1(a) as cavities 20-26 having frequencies  $f_1 - f_n$ . The relationship between the frequency of the cavity filter and its wavelength is clear. This means that although each opening of the cavity is located at an odd multiple of a quarter wavelength, the distance between the openings will *not* be as defined in claim 9, i.e.,  $(2n+1) * \lambda_g/4$ , because, for each opening, a different wavelength is used. In consequence, Barnett fails to disclose all the features of claim 9, and claim 9 is novel over Barnett.

The applicants respectfully submit that the combination of the teachings of Pierce and Barnett will not lead to the solution as recited in the amended claim 9, because Barnett fails to disclose a wall portion between two adjacent openings having a length of more than  $\lambda_g/4$ . The dimensions discussed by Barnett relate to distances from the short 38. Barnett does not discuss any dimensions of any openings, or the length of any wall between any such openings. In consequence, the amended claim 9 is also non-obvious over a combination of Pierce and Barnett.

In keeping with the duty of candor, accompanying this communication is Form PTO-1449, together with the Rule 17 (p) fee of \$180.00, and a copy of two additional prior art documents, namely, WO02/35642 and JP2000022412 (copy of the abstract in English and an automated translation are attached), for consideration and entry into the file.

Wherefore, an early action on the merits is earnestly solicited.

Respectfully submitted,

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